

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:12-cr-241 AGF (NAB)
)
SOUKEYE FOX,)
)
 Defendant.)

FIRST MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Soukeye Fox, by and through counsel, and hereby moves this Court pursuant to 18 U.S.C. § 3145(a)(2) to modify the conditions of release imposed on June 26, 2012, as requested below. In support of this motion Defendant states as follows:

1. Defendant is charged with a single violation of 18 U.S.C. § 2320.
2. On June 26, 2012, Defendant surrendered to the United States Marshals Service and presented for her initial appearance.
3. On that same date, this Court admitted Defendant to bail on a combination of conditions of release, [Doc. Text #14], determining that the conditions imposed would reasonably assure both her appearance at trial and the safety of the community and any other person.
4. Counsel entered his appearance on Defendant's behalf on July 9, 2012.
5. Meetings with Defendant subsequent to this date indicated to counsel that Defendant suffers from long-standing mental health issues for which treatment would seem appropriate.

6. As a result, counsel contacted Defendant's pretrial services officer to arrange for Defendant to receive mental health treatment through the Pretrial Services Office.

7. In turn, Defendant's pretrial services officer directed counsel to file a motion with this Court to add to Defendant's conditions of release a condition of mental health treatment or counseling.

8. For this reason, Defendant, through counsel, files the instant motion.

9. The Office of Pretrial Services does not object to Defendant's request and will assist Defendant with the mental health services once directed to do so by this Court.

WHEREFORE, Defendant respectfully requests this Honorable Court modify the conditions of release imposed on June 26, 2012 and add to them a condition of mental health treatment or counseling.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2012, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. John M. Bodenhause, assistant United States attorney.